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GQD-REMEDIAL ACTION

Minutes of Meeting Concerning MichCon

Tuesday, November 5, 1985

Present were: Everett Bole - Cadillac District; Anne Przybyla, Bonnie White, Roger Przybysz - Grand Rapids District; Ginny Loselle, Laura Southerland - Detroit District; Brad Venman, Tom Rohrer - Toxic Chemical Evaluation Section (TCES); Dan O'Neill - Land Application Unit (LAU); David Rymph - Environmental Enforcement Division (EED); Tom Work and Wanda Neal - Compliance Section #1

1. Summary

The meeting began by discussing the general location of the 15 MichCon sites - Jackson, Detroit, Cadillac, & Grand Rapids Districts. The major issues brought out during the course of the meeting included:

Is there concern from an environmental point of view that the MichCon sites should ultimately be cleaned up?

How can a format be developed to yield a consistent approach among GQD staff while working with the different MichCon sites?

It was agreed upon that the preliminary investigations conducted by EDS Engineering and Science for MichCon are deficient; the reports do not adequately address the potential environmental, nor public health hazards existing at the 15 sites; furthermore, the sites should ultimately be cleaned up.

GQD staff agreed to accept MichCon's proposal to conduct further investigations at the Greenville and an unspecified Detroit site.¹ As proposed by MichCon - studies at these two sites would determine a final approach phase, and would serve as models for further investigations at the remaining 11 sites.²

Before MichCon begins any further investigations at the Greenville and Detroit sites GQD staff insisted that they be allowed to review the work plans MichCon would use to conduct the studies. In this way staff can have initial input, and develop some consistency among the approach which will be taken at the remaining sites. It was, therefore, suggested that a letter from Rick Johns be sent to MichCon addressing staff concerns and the fact that GQD staff want to review work plans prior to investigations at the Greenville and Detroit sites. Wanda Neal agreed to draft such a letter for Rick Johns' signature.³

Staff from other divisions shared information to GQD staff relating to coal gasification plants. Below follows an outline of the meeting as discussion occurred:

xc: Gabel
Rendolph
Hercy
Cunningham
Guben

Steve C
12. 6. 11
- Files should be established

for these sites, either screen
& list on UFA, work closely

w/ Wanda N

and/or Anne C

to assure

'consistency' - also,

these look

like PR

and notes.

Don

2. Toxic Hazards of Coal Gasification By-Products (Aquatic Life)

Tom Rohrer representing TCES highlighted his review of the preliminary investigation reports for the Wealthy and Greenville sites located in the Grand Rapids District.

- The 2 sites have heavily contaminated soils - polynuclear aromatic hydrocarbons (PNAs) which include benzoanthracene, anthracene, naphthalene; benzene, toluene; arsenic, lead, chromium, cyanide - to name a few.
- Some consistency with aforementioned contaminants being present at both sites, contaminants close to surface, movement of contaminants in groundwater and discharge to surface water.
- Coal gasification by-products have particular impact on aquatic life.
- Contaminant levels indicated in preliminary investigations are not levels that SQD would permit; can cause tainting of fish.
- Disagreed with overall assessment prepared for MichCon by EDI.
- Consultant toxicologist hired by MichCon did not look into proper solution of problem.
- Suggested that removals should be conducted at the MichCon sites.

3. Toxic Hazards of Coal Gasification By-Products (Human Life)

Brad Venman representing TCES

- Imminent public health hazard posed by MichCon sites significantly reduced, because a direct exposure must exist.
- PNAs have been documented as carcinogenic if contained on the skin.
- Coal tar wastes as a whole can produce dermal and systemic tumors.
- Heavy sediments containing PNAs can produce tumors in fish. PNAs very insoluble and have ability to accumulate in fish.
- Expressed concern with consumption of fish where PNAs have been introduced into surface water.

4. Environmental Enforcement Division's Viewpoint

David Rymph, representing EED expressed concern that GQD staff should be handling the 15 MichCon sites in a consistent manner.

- \$25,000,000 budgeted by MichCon last summer to address problems at the sites. Reportedly MichCon has undergone reorganization and may no longer be planning to use the money.

- EED has a formal referral from Fisheries Division. Reportedly a fisheries spot next door to an unspecified MichCon site was recently closed due to tainted fish.
 - EED will view this meeting as an informal referral.
5. Effects of Coal Gasification By-Products in Soils and Groundwater

Dan O'Neill representing LAU had reviewed several of the preliminary reports from MichCon.

- Soils are a negative environment - would not expect certain chemicals to absorb.
- PNA's, e.g. are located in surface soils; there is not a mechanism for absorption. Due to low solubility, concentrations in groundwater will be low.
- Naphthalene very soluble; can move through soil profile and have great impact.
- In terms of discharge to groundwater there should be zero discharge of carcinogens (Made reference to letter from Rick Johns).
- Discharges from MichCon not authorized; as long as wastes remain there will be a continuous discharge.
- Questioned the appropriateness of giving MichCon permit to discharge . . . What if situation worsens?
- 2 year monitoring program proposed by MichCon in their "Summary of Findings" not adequate.
- Discussed present experience with Consumers Power coal gasification facility in Saginaw area. Facility wants to approach situation by simply monitoring. Dan, however, wants the site cleaned up.

It was indicated at this point that Detroit Edison, Consumers Power and various steel mills may have coal gasification sites staff are not aware of and should also be investigated.

David Rymph indicated that the "Superfund" law required all facilities to submit notification of past disposal sites. By contacting EPA, these sites could perhaps be identified. Wanda Neal agreed to contact EPA.⁴

It was stressed, however, that before notifying other coal gasification plants, a consistent approach should be developed to handle the MichCon sites.

6. General Discussion

Gene Hall indicated that 2 years ago a huge pit of coal tar was discovered at a Consumers Power facility. A PNA analysis was conducted; coal tar was collected and hauled to Wayne Disposal.

Laura Southerland concerned with discharge to surface water in regards to Riverside Park site. Should we determine what levels are discharged? Should we require monitoring?

Tom Rohrer indicated that TCES could obtain some estimates of the discharges. Stipulated, however, continuous source should be removed. This must be negotiated with MichCon. If GQD staff can give TCES staff preliminary investigation reports for MichCon, TCES can provide GQD staff with an appropriate statement.

GQD staff were asked to give priority to the review of each preliminary investigation report for the MichCon sites located in their respective districts.

When MichCon representatives request GQD staff to pinpoint deficiencies in the preliminary investigation reports, please be prepared with a written report.

1. See attached letter referencing meeting with MichCon.
2. Eleven sites instead of thirteen mentioned, because "Summary of Findings" proposed "no further action" be taken at sites J & H in Detroit District. This matter can be dealt with after staff have reviewed the work plans for the Greenville and Detroit sites.
3. Letter has been written. Rick Johns' signature pending upcoming meeting with EED.
4. EPA declined to go through each file to pull information. Remedial Action Section staff have same information as EPA (providing facilities complied with Superfund law to submit notification). Information can be pulled from R.A.S. files by going through each county file.

cc: Rick Johns, Chief, GQD
Tom Work, Chief, Compliance Section #1
Dave Dennis, Chief, Compliance Section #2
Gary Klepper, Chief, Remedial Action Section